

3.600 St. Louis County  
West County  
#11344

JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

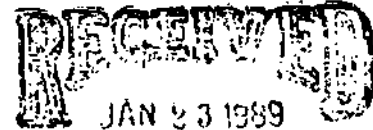
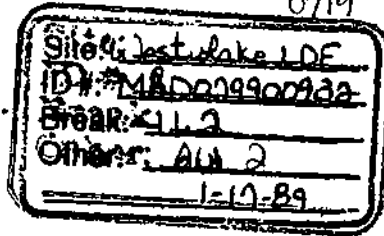
DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office  
8460 Watson Road, Suite 217  
St. Louis, MO 63119  
314-849-1313

CO-WMI  
*entire*  
Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

January 17, 1989

Mr. James Becker  
West County Disposal, Ltd.  
P.O. Box 428  
Valley Park, MO 63088



WASTE MANAGEMENT  
PROGRAM

Dear Mr. Becker:

Enclosed is a report of an inspection conducted by Mr. Bob Carlson of my staff. The report contains recommendations which the inspector has determined are warranted based on his findings at the facility.

Please review the report and implement the recommendations presented. Should you have any questions or comments, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

*Stuart Bean*

Stuart Bean  
Chief, Solid Waste Management Unit

SB:cj

Enclosure

cc: Central Office - WMP

40249216



SUPERFUND RECORDS

DNR 0044

Gully erosion was observed on the western slope of the completed section of the landfill. Straw had been applied to the slope to slow the erosion process, but had apparently been less than completely effective. No waste was exposed in the gullies. Establishing vegetation may be necessary for better erosion control.

RECOMMENDATIONS

1. Cover leachate outbreak areas with a layer of compacted soil. Take appropriate measures to insure that leachate does not leave the site.
2. Reapply cover material in all eroded areas as needed.

Within 30 days please notify this office of actions taken to comply with the above recommendations. If there are any questions concerning this report, please feel free to contact Mr. Bob Carlson at (314) 849-1313.

APPROVED:



F. Donald Madrox  
Regional Administrator  
St. Louis Regional Office

PREPARED BY:



Bob Carlson  
Environmental Specialist  
St. Louis Regional Office

FDM/BC/cj

3.600 St. Louis County  
West County 1

## SOLID WASTE FACILITY INSPECTION REPORT

### FACILITY

West County Disposal, Ltd., Sanitary Landfill  
St. Louis County  
MDNR Permit # 118911

### INTRODUCTION

On January 11, 1989, an inspection of the above facility was conducted to assess compliance with the Missouri Solid Waste Management Law and Regulations. Mr. Bob Carlson, Environmental Specialist, represented the Missouri Department of Natural Resources. Mr. Jim Lacocq represented the facility.

### FINDINGS

1. Filling was occurring in the wet-weather area in the northeast section.
2. A leachate outbreak was observed at the base of the slope at the northwest corner of the landfill.
3. Cover material had eroded in the new fill area at the north end of the site.
4. Gully erosion had occurred on the western slope of the landfill.

### DISCUSSION

Due to rains during and in the days previous to the inspection, filling operations were being conducted in the northeast section of the older landfill area, which had not yet reached its final permitted elevation. This area is more accessible during wet weather.

Ponded leachate was observed at the base of the landfill slope in the northwest section of the site. Mr. Lacocq stated that the outbreak had been ongoing for a few days, and that it would be capped as soon as conditions were dry enough to use the earth-moving vehicles in the area. The leachate and ponded rainwater were in a semi-frozen state, and were not likely to migrate off site in any case.

Previously applied cover material had eroded in the new fill area to the north, exposing some waste. Mr. Lacocq said that this would also be remedied when the area dried out enough, which he estimated to be a day or two. He said that the temporary road to the area would be improved with a layer of gravel as soon as possible.

**MISSOURI DEPARTMENT OF NATURAL RESOURCES**  
Division of Environmental Quality

**SANITARY LANDFILL SURVEILLANCE RECORD**

Date: 1 - 11 - 89 Days/Week Open: 6

Name of Sanitary Landfill: West County Disposal, Ltd., Sanitary Landfill

Permit No.: 118911 County: St. Louis County

Owner: West County Disposal, Ltd. Operator: (same)

Address: P.O. Box 428 Address: \_\_\_\_\_

Valley Park, MO 63088

**I. Remaining Life of Landfill:**

A. Estimated quantity of waste accepted,  
20,000 yds or tons/wk.

B. Estimated life of remaining landfill  
approved by engineering plans,  
8-10 yrs.

C. Fixed operating term date, N/A.

Permittee: (same)

Address: \_\_\_\_\_

Phone: (314) 225-7220

**II. Check all subsections: SAT-Satisfactory; UNS-Unsatisfactory; or NA-Not Applicable.**  
If necessary, describe "UNS" violations under "Remarks".

		SAT	UNS	NA			SAT	UNS	NA
15.01.000 Permit Issuance, Special Operating	15.01.000 Permit Issuance, Special Operating				15.01.000 Permit Issuance, Special Operating	15.01.000 Permit Issuance, Special Operating			
15.01.001 Authorization to operate obtained prior to acceptance of waste.	15.01.001 Authorization to operate obtained prior to acceptance of waste.			✓	15.01.001 Authorization to operate obtained prior to acceptance of waste.	15.01.001 Authorization to operate obtained prior to acceptance of waste.	✓		
15.01.002 Site constructed and operated per approved terms and conditions of permit.	15.01.002 Site constructed and operated per approved terms and conditions of permit.	✓			15.01.002 Site constructed and operated per approved terms and conditions of permit.	15.01.002 Site constructed and operated per approved terms and conditions of permit.			✓
15.01.003 Certified Solid Waste Technicians.	15.01.003 Certified Solid Waste Technicians.				15.01.003 Certified Solid Waste Technicians.	15.01.003 Certified Solid Waste Technicians.			✓
15.01.004 Site operated by a certified solid waste technician.	15.01.004 Site operated by a certified solid waste technician.	✓			15.01.004 Site operated by a certified solid waste technician.	15.01.004 Site operated by a certified solid waste technician.			✓
15.01.005 Sanitary Landfill Design and Operation	15.01.005 Sanitary Landfill Design and Operation				15.01.005 Sanitary Landfill Design and Operation	15.01.005 Sanitary Landfill Design and Operation			
15.01.006 Solid waste crushed on site ground and pushed onto working face near bottom of the cell.	15.01.006 Solid waste crushed on site ground and pushed onto working face near bottom of the cell.	✓			15.01.006 Solid waste crushed on site ground and pushed onto working face near bottom of the cell.	15.01.006 Solid waste crushed on site ground and pushed onto working face near bottom of the cell.			✓
15.01.007 Small dead animals covered immediately with soil or solid waste.	15.01.007 Small dead animals covered immediately with soil or solid waste.	✓			15.01.007 Small dead animals covered immediately with soil or solid waste.	15.01.007 Small dead animals covered immediately with soil or solid waste.			✓
15.01.008 The disposal of special waste approved in the permit conducted in accordance with approved design and plans.	15.01.008 The disposal of special waste approved in the permit conducted in accordance with approved design and plans.	✓			15.01.008 The disposal of special waste approved in the permit conducted in accordance with approved design and plans.	15.01.008 The disposal of special waste approved in the permit conducted in accordance with approved design and plans.			✓
15.01.009.A Written approval from the department obtained for special waste not approved in permit.	15.01.009.A Written approval from the department obtained for special waste not approved in permit.	✓			15.01.009.A Written approval from the department obtained for special waste not approved in permit.	15.01.009.A Written approval from the department obtained for special waste not approved in permit.		✓	
15.01.009.B Approved special waste disposed of properly.	15.01.009.B Approved special waste disposed of properly.	✓			15.01.009.B Approved special waste disposed of properly.	15.01.009.B Approved special waste disposed of properly.	✓		
15.01.010 Sign posted at entrance listing excluded waste.	15.01.010 Sign posted at entrance listing excluded waste.	✓			15.01.010 Sign posted at entrance listing excluded waste.	15.01.010 Sign posted at entrance listing excluded waste.	✓		
15.01.011 Procedure for screening and removal of excluded waste.	15.01.011 Procedure for screening and removal of excluded waste.	✓			15.01.011 Procedure for screening and removal of excluded waste.	15.01.011 Procedure for screening and removal of excluded waste.	✓		
15.01.012 Large dead animals placed in pit and covered with four feet of compacted soil.	15.01.012 Large dead animals placed in pit and covered with four feet of compacted soil.	✓			15.01.012 Large dead animals placed in pit and covered with four feet of compacted soil.	15.01.012 Large dead animals placed in pit and covered with four feet of compacted soil.	✓		
15.01.013 Exclude wastes listed in subsection 15.01.014 of this rule shall not be accepted for disposal.	15.01.013 Exclude wastes listed in subsection 15.01.014 of this rule shall not be accepted for disposal.	✓			15.01.013 Exclude wastes listed in subsection 15.01.014 of this rule shall not be accepted for disposal.	15.01.013 Exclude wastes listed in subsection 15.01.014 of this rule shall not be accepted for disposal.	✓		
15.01.014 Site accessible in all weather conditions. Temporary roads provided for delivery to working face.	15.01.014 Site accessible in all weather conditions. Temporary roads provided for delivery to working face.	✓			15.01.014 Site accessible in all weather conditions. Temporary roads provided for delivery to working face.	15.01.014 Site accessible in all weather conditions. Temporary roads provided for delivery to working face.	✓		
15.01.015 If access roads or public roads are flooded, alternate sanitary landfill is available.	15.01.015 If access roads or public roads are flooded, alternate sanitary landfill is available.	✓			15.01.015 If access roads or public roads are flooded, alternate sanitary landfill is available.	15.01.015 If access roads or public roads are flooded, alternate sanitary landfill is available.	✓		
15.01.016 Name: <u>WestCo Inc.</u>	15.01.016 Name: <u>WestCo Inc.</u>				15.01.016 Name: <u>WestCo Inc.</u>	15.01.016 Name: <u>WestCo Inc.</u>			
15.01.017 Construction and operation of the site is conducted in accordance with engineering plans and specifications.	15.01.017 Construction and operation of the site is conducted in accordance with engineering plans and specifications.	✓			15.01.017 Construction and operation of the site is conducted in accordance with engineering plans and specifications.	15.01.017 Construction and operation of the site is conducted in accordance with engineering plans and specifications.	✓		
15.01.018 Minimum fifty foot buffer zone maintained between site operations and property boundary.	15.01.018 Minimum fifty foot buffer zone maintained between site operations and property boundary.			✓	15.01.018 Minimum fifty foot buffer zone maintained between site operations and property boundary.	15.01.018 Minimum fifty foot buffer zone maintained between site operations and property boundary.			✓
15.01.019 Operating manual available to employees and the department.	15.01.019 Operating manual available to employees and the department.			✓	15.01.019 Operating manual available to employees and the department.	15.01.019 Operating manual available to employees and the department.	✓		
15.01.020 Boundary markers, benchmarks, horizontal control stations and construction stakes marked and identified.	15.01.020 Boundary markers, benchmarks, horizontal control stations and construction stakes marked and identified.			✓	15.01.020 Boundary markers, benchmarks, horizontal control stations and construction stakes marked and identified.	15.01.020 Boundary markers, benchmarks, horizontal control stations and construction stakes marked and identified.			✓
15.01.021 Missing or displaced benchmarks or horizontal control stations replaced or re-established.	15.01.021 Missing or displaced benchmarks or horizontal control stations replaced or re-established.			✓	15.01.021 Missing or displaced benchmarks or horizontal control stations replaced or re-established.	15.01.021 Missing or displaced benchmarks or horizontal control stations replaced or re-established.			✓
15.01.022 Missing or displaced construction stakes replaced or re-established as necessary.	15.01.022 Missing or displaced construction stakes replaced or re-established as necessary.			✓	15.01.022 Missing or displaced construction stakes replaced or re-established as necessary.	15.01.022 Missing or displaced construction stakes replaced or re-established as necessary.			✓
15.01.023 Permanent monuments and boundary markers placed prior to receiving authorization to operate.	15.01.023 Permanent monuments and boundary markers placed prior to receiving authorization to operate.			✓	15.01.023 Permanent monuments and boundary markers placed prior to receiving authorization to operate.	15.01.023 Permanent monuments and boundary markers placed prior to receiving authorization to operate.			✓
15.01.024 Construction stakes marking the active area placed prior to deposition of waste in individual areas.	15.01.024 Construction stakes marking the active area placed prior to deposition of waste in individual areas.			✓	15.01.024 Construction stakes marking the active area placed prior to deposition of waste in individual areas.	15.01.024 Construction stakes marking the active area placed prior to deposition of waste in individual areas.			✓
15.01.025 Surface watercourses and runoff properly diverted from the landfill. Sanitary landfill construction and grading to promote rapid surface water runoff without excessive erosion.	15.01.025 Surface watercourses and runoff properly diverted from the landfill. Sanitary landfill construction and grading to promote rapid surface water runoff without excessive erosion.			✓	15.01.025 Surface watercourses and runoff properly diverted from the landfill. Sanitary landfill construction and grading to promote rapid surface water runoff without excessive erosion.	15.01.025 Surface watercourses and runoff properly diverted from the landfill. Sanitary landfill construction and grading to promote rapid surface water runoff without excessive erosion.		✓	
15.01.026 Contact with solid waste shall be minimized by daily operation.	15.01.026 Contact with solid waste shall be minimized by daily operation.	✓			15.01.026 Contact with solid waste shall be minimized by daily operation.	15.01.026 Contact with solid waste shall be minimized by daily operation.	✓		
15.01.027 Leachate collection system properly installed and operated in accordance with the permit and approved plans.	15.01.027 Leachate collection system properly installed and operated in accordance with the permit and approved plans.	✓			15.01.027 Leachate collection system properly installed and operated in accordance with the permit and approved plans.	15.01.027 Leachate collection system properly installed and operated in accordance with the permit and approved plans.	✓		
15.01.028 Liner constructed in accordance with approved design specifications.	15.01.028 Liner constructed in accordance with approved design specifications.	✓			15.01.028 Liner constructed in accordance with approved design specifications.	15.01.028 Liner constructed in accordance with approved design specifications.	✓		
15.01.029 Leachate generated on-site controlled on-site and not allowed to discharge off the sanitary landfill or discharge into waters of the state.	15.01.029 Leachate generated on-site controlled on-site and not allowed to discharge off the sanitary landfill or discharge into waters of the state.	✓			15.01.029 Leachate generated on-site controlled on-site and not allowed to discharge off the sanitary landfill or discharge into waters of the state.	15.01.029 Leachate generated on-site controlled on-site and not allowed to discharge off the sanitary landfill or discharge into waters of the state.	✓		
15.01.030 Leachate and runoff managed in accordance with the Missouri Clean Water Law and Rules.	15.01.030 Leachate and runoff managed in accordance with the Missouri Clean Water Law and Rules.	✓			15.01.030 Leachate and runoff managed in accordance with the Missouri Clean Water Law and Rules.	15.01.030 Leachate and runoff managed in accordance with the Missouri Clean Water Law and Rules.	✓		
15.01.031.A Groundwater monitoring wells installed per approved plans.	15.01.031.A Groundwater monitoring wells installed per approved plans.	✓			15.01.031.A Groundwater monitoring wells installed per approved plans.	15.01.031.A Groundwater monitoring wells installed per approved plans.	✓		
15.01.031.B Groundwater monitoring wells operational prior to acceptance of waste, unless other arrangements are approved.	15.01.031.B Groundwater monitoring wells operational prior to acceptance of waste, unless other arrangements are approved.	✓			15.01.031.B Groundwater monitoring wells operational prior to acceptance of waste, unless other arrangements are approved.	15.01.031.B Groundwater monitoring wells operational prior to acceptance of waste, unless other arrangements are approved.	✓		
15.01.032 Burning of solid waste prohibited unless a burning permit is obtained from the department or, when appropriate, local pollution control agency.	15.01.032 Burning of solid waste prohibited unless a burning permit is obtained from the department or, when appropriate, local pollution control agency.	✓			15.01.032 Burning of solid waste prohibited unless a burning permit is obtained from the department or, when appropriate, local pollution control agency.	15.01.032 Burning of solid waste prohibited unless a burning permit is obtained from the department or, when appropriate, local pollution control agency.	✓		
15.01.033 Decomposition gas control systems implemented as necessary to prevent migration and accumulation.	15.01.033 Decomposition gas control systems implemented as necessary to prevent migration and accumulation.	✓			15.01.033 Decomposition gas control systems implemented as necessary to prevent migration and accumulation.	15.01.033 Decomposition gas control systems implemented as necessary to prevent migration and accumulation.	✓		

		IAF	INS	N/A			IAF	INS	N/A
(11)(C)1.A.	Decomposition gas not allowed to concentrate in any site above twenty-five percent methane.	✓			(13)(C)6.	Regrading and recovering to maintain cover slope and	✓		
(11)(C)1.B.	Decomposition gases not allowed to concentrate in the soil at the property boundary above five percent LEL for methane.	✓			(13)(C)7.	Borrow areas reclaimed in accordance with approved plans.	✓		
(11)(C)1.C.	Decomposition gas monitoring results submitted to the department as required by permit.	✓			(14)(C)1.	Adequate solid waste handling equipment on-site and operated as necessary.	✓		
(11)(C)1.D.	Landfill operated in compliance with applicable requirements of Chapter 643, 2330 and Rules.	✓			(14)(C)1.A.	Solid waste to be compacted, spread in layers no more than two feet thick and confined to smallest practical area.	✓		
(11)(C)1.E.	Vector control programs implemented when necessary.	✓			(14)(C)1.B.	Waste compacted to smallest practical volume.	✓		
(12)(C)1.	Litter control devices utilized near working face and elsewhere as needed. Litter collected from fences, and the ground surface, and incorporated into the active cell at the end of each day or consolidated.	✓			(14)(C)1.C.	Cover compacted as much as practical.	✓		
(12)(C)2.	Wastes easily moved by wind covered as necessary to prevent their becoming airborne and scattered.	✓			(14)(C)2.	Preventive maintenance performed on equipment.	✓		
(12)(C)3.	On-site vegetation cleared only as necessary.	✓			(14)(C)3.	Solid waste not disposed of in water to prohibit spreading and compaction or causing mosquito breeding problem.	✓		
(12)(C)4.	Salvaged materials removed daily or stored in aesthetically acceptable containers or enclosures.	✓			(15)(C)1.	Fire extinguishers provided on all solid waste handling equipment.	✓		
(13)(C)1.	Cover applied at the end of each operating day regardless of weather in a compacted layer not less than six inches thick. Cover material available in all weather conditions.	✓			(15)(C)2.	All fires in wastes being delivered to the site or which occur at the working face or within equipment extinguished.	✓		
(13)(C)2.	Cover applied to completed areas of the landfill idle more than 60 days in a compacted layer not less than one foot thick.	✓			(15)(C)3.	Communications equipment available.	✓		
(13)(C)3.	Cover applied to completed areas of the landfill in a compacted layer not less than two feet thick overlain by at least one foot of soil, as required, capable of supporting vegetation.	✓			(15)(C)4.	Scavenging prohibited.	✓		
(13)(C)4.	Final side slopes not to exceed 3 1/3 percent.	✓			(15)(C)5.	Controlled access to site by established roadways and limited to hours when operating personnel are on duty.	✓		
(13)(C)5.	Vegetation established within one hundred and eighty days of application or regrading of cover required by (13)(C)2. and 3.	✓			(15)(C)6.	Traffic controlled and directed to distinguish disposing units.	✓		
					(15)(C)7.	Site dust controlled for safety purposes and to prevent nuisances.	✓		
					(16)(C)1.A.	Records of major problems and complaints maintained.	✓		
					(16)(C)1.B.	Monitoring records maintained: a. leachate sampling and analyses, b. gas sampling and analyses, c. ground and surface water analyses.	✓		
					(16)(C)1.C.	Records of vector control efforts maintained.	✓		
					(16)(C)1.D.	Records of dust and litter control efforts maintained.	✓		
					(16)(C)1.E.	Records of quantity of waste handled maintained.	✓		
					(16)(C)1.F.	Records of description, sources and volume of special wastes listed in Subsection (1)(A) maintained.	✓		

REMARKS:

BY:

*MA 2 C*  
Signature of Inspector

OFFICE:

*SLR0*